

The Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

MICHAEL HOLEN, individually,

**Plaintiff**

NO. 2:17-CV-01147-JLR

VS.

**STIPULATION AND ORDER GRANTING  
LEAVE TO AMEND COMPLAINT FOR  
PERSONAL INJURIES AND DAMAGES**

10 SASA JOZIC, individually, and JANE DOE  
11 JOZIC, and the marital community composed  
12 thereof, BLUE LAND TRANSPORTATION,  
INC., a foreign corporation, and COASTAL  
PACIFIC XPRESS, INC., a foreign corporation.

**Defendants.**

## **STIPULATION.**

15 The parties, by and through their attorneys of record, stipulate as follows:

16       1. On June 29, 2017, Plaintiff filed a Summons and Complaint for Damages in the King County  
17 Superior Court. In his Complaint, Plaintiff sought damages for injuries incurred in a motor vehicle  
18 collision September 28, 2014 when a tractor/trailer drove into the rear of a construction vehicle on  
19 I-5 Southbound near the 175th Street exit.

20       2. In his Complaint, Plaintiff named Sasa Jozic, Blue Land Transportation, Inc. ("BLT") and  
21 Coastal Pacifico Xpress, Inc. ("CPX") as defendants.

22 3. Sasa Jozic was the driver of the tractor/trailer involved in the collision.

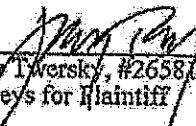
**STIPULATION AND ORDER GRANTING LEAVE TO AMEND  
COMPLAINT FOR PERSONAL INJURIES AND DAMAGES - 1**

**KADISH TWERSKY LAW FIRM**  
2920 COLBY AVENUE, SUITE 100  
Everett, WA 98201  
425-252-5911

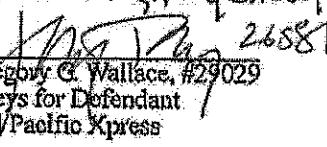
- 1           4. Defendant BLT owned of the tractor that defendant Jozic was driving.
- 2           5. Defendant CPX owned the trailer being towed by the Blue Land Transportation tractor.
- 3           6. Plaintiff served defendants BLT and CPX on June 30, 2017.
- 4           7. Plaintiff served defendant Jozic on 9/25/17
- 5           8. Defendants Jozic and BLT appeared and filed their Notice of Removal from King County
- 6           Superior Court to the United States District Court for the Western District of Washington.
- 7           9. Defendants Jozic and BLT filed and served their Answer on August 7, 2017.
- 8           10. In his Complaint, Plaintiff alleged that Jozic was employed by one or both defendants.
- 9           11. In the course of discovery, Plaintiff obtained copies of two written contracts entered into
- 10          between defendants BLT and CPX, which purports to set forth the relationship between those
- 11          Defendants.
- 12          12. Plaintiff has taken the depositions of representatives of BLT and CPX, as well Plaintiff's
- 13          deposition.
- 14          13. While BLT's and CPX's representatives testified differently as to the applicability of the two
- 15          contracts to this case, they did clarify the situation with defendant Jozic's employment.
- 16          14. At his deposition, defendant Jozic testified that to the facts of the subject collision.
- 17          Pursuant to LCR 15, a copy of the First Amended Complaint for Personal Injuries and Damages
- 18          is attached hereto as Exhibit 1, and a marked up copy of the First Amended Complaint for Personal
- 19          Injuries and Damages is attached hereto as Exhibit 2.
- 20          The parties stipulate to the amendment of the Complaint.
- 21
- 22

1 Dated: June 18, 2018

2 Kadish Twersky Law Firm

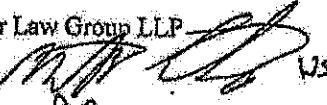
3 By:   
4 Jeffrey Twersky, #26581  
5 Attorneys for Plaintiff

6 Dated: June       , 2018

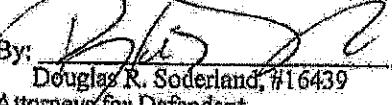
7 Office of Vitale & Wallace  
8 Approved to sign by email  
9 By:   
10 Gregory C. Wallace, #29029  
11 Attorneys for Defendant  
Coastal/Pacific Xpress

Dated: June 29, 2018

Scheer Law Group LLP

By:   
Dennis G. Woods, #28713  
Attorneys for Defendant  
Blue Land Transportation, Inc.

Dated: June 30, 2018

Law Offices of Douglas R. Soderland  
  
By:   
Douglas R. Soderland, #16439  
Attorneys for Defendant  
Sasa Jozic

11  
12 ORDER

13 THIS MATTER having come on before the Court on stipulation of the parties,

14 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Court grants to Plaintiff

15 leave to amend Complaint. Plaintiff must file his amended complaint (Ex. 1)  
within three (3) days of the date of this order.

16 IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that service of the

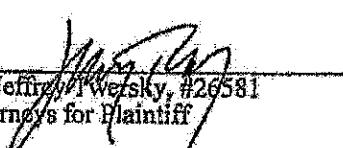
17 First Amended Complaint may be made on all Defendants by serving their respective counsel of  
record by mail.

18 Dated: June 11th, 2018

19 Honorable James L. Robart

1 Presented by:

2 Kadish Twersky Law Firm

3 By:   
4 Jeffrey Twersky, #26581  
5 Attorneys for Plaintiff

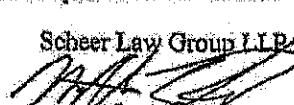
6 Approved as to form;  
7 Notice of presentation waived:

8 Law Office of Vitale & Wallace

9 Authorized to sign for by email:  
10 By:   
11 Gregory G. Wallace, #29029  
12 Attorneys for defendant  
13 Coastal Pacific Xpress

Approved as to form;  
Notice of presentation waived:

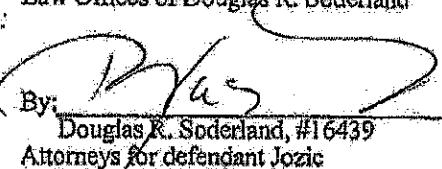
Scheer Law Group LLP

 WSGA #43790

By:   
Dennis G. Woods, #28713  
Attorneys for defendant  
Blue Land Transportation, Inc.

Approved as to form;  
Notice of presentation waived:

Law Offices of Douglas R. Soderland

By:   
Douglas R. Soderland, #16439  
Attorneys for defendant Jozic